

Mark Griffin
Nishikawa Standard Company
324 Morrow Street
Topeka, Indiana 46571

Re: 087-14376
First Minor Permit Modification to
Part 70 No.: T 087-7181-00031

Dear Mr. Griffin:

Nishikawa Standard Company was issued a Part 70 permit on April 12, 2001 for a source that manufactures automotive rubber weatherstripping products. A letter requesting changes to this permit was received on April 7, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby modified to incorporate the new operation conditions for the following facilities (changes are bolded and deletions are struck-through for emphasis):

- (a) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (b) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.

Section A.2 of the issued permit will be modified to include the above new facilities and be identified as items (ee) and (ff).

Section D.5 has been added to the permit to incorporate the new applicable requirements for the above new facilities:

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (ee) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (ff) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the VOC potential emissions from spray line, X-034 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.5.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (1) Pursuant to 326 IAC 6-3, the PM emissions from the extruder line, X-033 shall be limited to 3.05 pounds per hour at process weight rate of 1,289 pounds per hour (0.64 tons/hour). This limit shall be determined using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (2) Spray line, X-034 PM overspray emissions shall be limited using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan in accordance with Section B - Preventive Maintenance Plan of the Part 70 permit, is required for these facilities and the control device.

Compliance Determination Requirements

D.5.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required by this permit to perform compliance tests. However, the Commissioner reserves the right to invoke its authority under 326 IAC 2-1.1-11 to require stack testing, monitoring or reporting at any time to assure compliance with all applicable requirements. If testing is required by IDEM, compliance with Condition D.5.1 and D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing of the Part 70 permit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.5 Particulate Matter (PM)

The dry filters shall be in operation at all times Spray Line, X-034 is in operation, in order to comply with the limit in Condition D.5.2.

D.5.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from Spray Line, X-034 stack PEF-E3 while the spray line is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.5.1.**

 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (2) The cleanup solvent usage for each month;**
 - (3) The total VOC usage for each month; and**
 - (4) The weight of VOCs emitted for each compliance period.**
- (b) To document compliance with Condition D.5.2 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the Part 70 permit.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - LaGrange County
U.S. EPA, Region V
LaGrange County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Nishikawa Standard Company
324 Morrow Street
Topeka, Indiana 46571**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 087-7182-00031	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 12, 20001
First Minor Permit Modification No.: 087-14376	Affected Page: 9, 10, 41 Pages Added: 41a, 41b, 41c
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: July 20, 2001

hour and 4.8 pounds of talc per hour.

- (dd) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.
- (ee) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (ff) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Pellet Lines Mixing Mills A, C, D and E [326 IAC 6-3]
- (b) Pelletizers and Tumblers [326 IAC 6-3]
- (c) Dango Mixing Mills B and F [326 IAC 6-3]
- (d) Color Mixing Mill [326 IAC 6-3]
- (e) SDM Finishing Drill and Fastener Inserter Units [326 IAC 6-3]
- (f) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (g) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (h) Dango Barwell Extruders [326 IAC 6-3]
- (i) Polymer Block Cutting Station [326 IAC 6-3]
- (j) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (k) Weld Shop Equipment [326 IAC 6-3]
- (l) CV Annealing Oven [326 IAC 6-3]
- (m) Silicone Coating Mixing Station [326 IAC 6-3]
- (n) Die Room Metalworking Equipment [326 IAC 6-3]
- (o) SDM Mezzanine Units [326 IAC 6-3]

- (p) Building B Maintenance Shotblast Unit [326 IAC 6-3]
- (q) Six (6) Building A HVAC Units [326 IAC 6-3]
- (r) CV Mezzanine Units [326 IAC 6-3]
- (s) Chemical Storage Room Mixing Station [326 IAC 6-3]
- (t) SDM Finishing Drill and Size Machines [326 IAC 6-3]
- (u) Building C HVAC Unit [326 IAC 6-3]
- (v) Mixing Department "Safety Kleen" Unit [326 IAC 8-3]
- (w) Maintenance "Safety-Kleen" Unit [326 IAC 8-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (ee) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (ff) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the VOC potential emissions from spray line, X-034 to 25 tons per year or greater shall be subject to 326 IAC 8-1-6 (General Reduction Requirements) and must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.5.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (1) Pursuant to 326 IAC 6-3, the PM emissions from the extruder line, X-033 shall be limited to 3.05 pounds per hour at process weight rate of 1,289 pounds per hour (0.64 tons/hour). This limit shall be determined using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$

P = process weight rate in tons per hour

- (2) Spray line, X-034 PM overspray emissions shall be limited using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$

P = process weight rate in tons per hour

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan in accordance with Section B - Preventive Maintenance Plan of the Part 70 permit, is required for these facilities and the control device.

Compliance Determination Requirements

D.5.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required by this permit to perform compliance tests. However, the Commissioner reserves the right to invoke its authority under 326 IAC 2-1.1-11 to require stack testing, monitoring or reporting at any time to assure compliance with all applicable requirements. If testing is required by IDEM, compliance with Condition D.5.1 and D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing of the Part 70 permit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.5 Particulate Matter (PM)

The dry filters shall be in operation at all times Spray Line, X-034 is in operation, in order to comply with the limit in Condition D.5.2.

D.5.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from Spray Line, X-034 stack PEF-E3 while the spray line is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.5.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.5.2 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the Part 70 permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Modification

Source Background and Description

Source Name:	Nishikawa Standard Company
Source Location:	324 Morrow Street, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	3061
Operation Permit No.:	T 087-7182-00031
Operation Permit Issuance Date:	April 12, 2001
Minor Permit Modification No.:	087-14376
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Nishikawa Standard Company relating to the operation of the following equipment used in the manufacture of automotive rubber weatherstripping products:

- (a) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (b) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.

History

On May 7, 2001, Nishikawa Standard Company submitted an application to the OAQ requesting to add new equipment to their existing plant. Nishikawa Standard Company was issued a Part 70 permit on April 12, 2001.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 7, 2001.

Emission Calculations

See Source Modification Technical Support Document 087-14331.

Justification of the Level of Approval

This Minor Permit Modification pursuant to 326 IAC 2-7-12(b) is being issued to incorporate the requirements from a preconstruction permit (Minor Source Modification 087-14331) under 326 IAC 2-7-10.5 that have not satisfied the requirements of 326 IAC 2-7-17 and 2-7-18, and that cannot be implemented under an Administrative Amendment nor a Significant Permit Modification.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. LaGrange County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60)
See the determination made in the Source Modification 087-14331.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63)
See the determination made in the Source Modification 087-14331.

State Rule Applicability -

See the determination made in the Source Modification 087-14331.

Changes to the Part 70 Permit

1. The new facilities were added in Section A.2 Emission Units and Pollution Control Equipment Summary on Page 5 of 50, and were identified as items (ee) and (ff).
2. The following new section was created (changes are bolded and deletions are struck-through for emphasis):

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (ee) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
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 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and

- (4) **The weight of VOCs emitted for each compliance period.**
- (b) **To document compliance with Condition D.5.2 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the Part 70 permit.**

Conclusion

The operation of the proposed spray coating line and extrusion line shall be subject to the conditions of the attached **Minor Permit Modification No. 087-14376-00031**.

